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Shelley D. Krohn, Chapter 7 Trustee of the  
Lucky Dragon, LP Estate*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SNOW COVERED CAPITAL, LLC,

Plaintiff,

vs.

WILLIAM WEIDNER, ANDREW FONFA,  
DAVID JACOBY, and LUCKY DRAGON,  
LP,

Defendants.

SHELLEY D. KROHN, Chapter 7 Trustee of  
the LUCKY DRAGON, LP Estate,

Counter-claimant,

vs.

SNOW COVERED CAPITAL, LLC,  
NELLIE LLC, 1421 CAPITAL LLC, and  
ASSOCIATE CAPITAL, LLC,

Counter-defendant,

Case No. 2:19-00595-JAD-NJK

**STIPULATION TO EXTEND BRIEFING  
SCHEDULE ON PLAINTIFF SCC'S  
MOTION TO DISMISS LUCKY  
DRAGON, LP'S FIRST AMENDED  
COUNTERCLAIMS AND MOTION TO  
STRIKE LUCKY DRAGON, LP'S FIRST  
AMENDED ANSWER AND  
COUNTERCLAIM**

1 Pursuant to LR 7-1, LR IA 601, and LR IA 602, Defendant / Counterclaimant, Shelley D.  
2 Krohn, Chapter 7 Trustee of the Lucky Dragon LP Estate (“LDLP”) and Plaintiff / Counterdefendant,  
3 Snow Covered Capital, LLC (“SCC”) stipulate and agree as follows:

4 WHEREAS, on April 8, 2019, SCC filed its complaint in this proceeding [ECF No. 1];

5 WHEREAS, on June 18, 2019, LDLP filed an Answer and Counterclaims [ECF No. 19];

6 WHEREAS, on July 9, 2019, SCC filed its Motion to Dismiss Counterclaims Asserted by  
7 LDLP [ECF No. 50];

8  
9 WHEREAS, on July 9, 2019, SCC also filed a Motion to Strike LDLP’s Answer and  
10 Counterclaims [ECF No. 52];

11 WHEREAS, on July 19, 2019 the parties, including Defendants, William Weidner, Andrew  
12 Fonfa and David Jacoby (together with LDLP, “Defendants”), entered into a stipulation [ECF No. 56]  
13 extending the Defendants’ time for responding to the SCC motions to strike to July 30, 2019 and  
14 setting an August 9, 2019 reply date for the three motions to strike and an August 12, 2019 reply date  
15 for SCC’s motion to dismiss the LDLP Counterclaim. This stipulation was endorsed by the Court on  
16 July 23, 2019 [ECF No 57];

17  
18 WHEREAS, the Defendants all filed responses to the motion to strike on July 30, 2019 [ECF  
19 Nos. 62, 63, 64], but Defendant LDLP also filed an Amended Answer and Counterclaim [ECF No.  
20 61] that the Court held [ECF No. 73] superseded the counterclaim to which SCC’s July 9, 2019 motion  
21 to dismiss [ECF No. 50] had been directed and so mooted the existing SCC motion to dismiss. The  
22 same problem existed for the SCC motion to strike LDLP’s original answer, though that aspect of the  
23 mootness problem was not referenced in the Court’s August 7, 2019 minute order [ECF No. 73];

24  
25 WHEREAS, SCC filed a Motion to Dismiss LDLP’s First Amended Counterclaims [ECF No.  
26 82] and a Motion to Strike LDLP’s First Amended Answer and Counterclaims [ECF No. 85] on  
27 August 13, 2019, jointly, “Motions;”  
28

1 WHEREAS, the deadline for LDLP to respond to SCC's Motions is currently August 27, 2019,  
2 and the replies are currently due September 3, 2019;

3 WHEREAS, the parties to this stipulation make this request to accommodate conflicting  
4 schedules and concurrent deadlines in other litigation. This is the first request by the undersigned to  
5 respond to these Motions;

6 **IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned counsel  
7 for the named parties hereto, that the time for LDLP to respond to the Motions [ECF No. 82 and ECF  
8 No. 85] is now extended three days to August 30, 2019, and SCC's time to file any reply is now  
9 extended to September 6, 2019.

10 **STIPULATED AND AGREED:**

11 Dated: August 27, 2019.

12 By: /s/ Douglas D. Gerrard, Esq.

13 Douglas D. Gerrard

14 Gary C. Milne

15 GERRARD COX LARSEN

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17 Henderson, Nevada 89074

18 *Attorneys for Shelley D. Krohn, Chapter 7*

19 *Trustee for the Lucky Dragon LP Bankruptcy*  
20 *Estate*

By: /s/ James D. McCarthy, Esq.

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*Attorneys for Snow Covered Capital, LLC*

**IT IS SO ORDERED:**

21   
22 UNITED STATES MAGISTRATE  
23 JUDGE

24 DATED: August 29, 2019  
25  
26  
27  
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